

KATTEN MUCHIN ROSENMAN LLP
50 Rockefeller Plaza
New York, New York 10020
(212) 940-8800

Hearing Date: September 14,
2022 at 10:00 a.m. (ET)
Opposition Date: June 17, 2022
Reply Date: July 29, 2022

Attorneys for Defendants
Access International Advisors LLC,
Access International Advisors Ltd.,
Access Management Luxembourg SA,
Access Partners SA, Patrick Littaye,
Claudine Magon de la Villehuchet, and
Groupement Financier Ltd.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION)	
CORPORATION,)	Adv. Pro. No. 08-01789 (CGM)
Plaintiff-Applicant,)	
v.)	SIPA Liquidation
BERNARD L. MADOFF INVESTMENT)	(Substantively Consolidated)
SECURITIES, LLC,)	
Defendant.)	
In re:)	
BERNARD L. MADOFF,)	
Debtor.)	
IRVING H. PICARD, Trustee for the Liquidation of)	
Bernard L. Madoff Investment Securities LLC,)	
Plaintiff,)	Adv. Pro. No. 10-04285 (CGM)
v.)	
UBS AG, UBS EUROPE SE (f/k/a UBS)	
(LUXEMBOURG) SA), UBS FUND)	
SERVICES (LUXEMBOURG) SA, UBS)	
THIRD PARTY MANAGEMENT)	
COMPANY SA, ACCESS)	
INTERNATIONAL ADVISORS LLC,)	
ACCESS INTERNATIONAL ADVISORS)	
LTD., ACCESS MANAGEMENT)	
LUXEMBOURG SA (f/k/a ACCESS)	
INTERNATIONAL ADVISORS)	

(LUXEMBOURG) SA) as represented by its)
Liquidator MAÎTRE FERNAND)
ENTRINGER, ACCESS PARTNERS SA as)
represented by its Liquidator MAÎTRE)
FERNAND ENTRINGER, PATRICK)
LITTAYE, CLAUDINE MAGON DE LA)
VILLEHUCHET (a/k/a CLAUDINE DE LA)
VILLEHUCHET) in her capacity as)
Executrix under the Will of THIERRY)
MAGON DE LA VILLEHUCHET (a/k/a)
RENE THIERRY DE LA VILLEHUCHET),)
CLAUDINE MAGON DE LA)
VILLEHUCHET (a/k/a CLAUDINE DE LA)
VILLEHUCHET) individually as the sole)
beneficiary under the Will of THIERRY)
MAGON DE LA VILLEHUCHET (a/k/a)
RENE THIERRY DE LA VILLEHUCHET),)
PIERRE DELANDMETER, THEODORE)
DUMBAULD, LUXALPHA SICAV as)
represented by its Liquidators MAÎTRE)
ALAIN RUKAVINA and PAUL)
LAPLUME, MAÎTRE ALAIN RUKAVINA)
AND PAUL LAPLUME, in their capacities)
as liquidators and representatives of)
LUXALPHA, GROUPEMENT FINANCIER)
LTD.,)
)
Defendants.)
)

NOTICE OF HEARING

PLEASE TAKE NOTICE that a hearing on the motion (the “Motion”) listed on **Exhibit**

A attached hereto will be held on **September 14, 2022 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel can be heard, before the Honorable Cecilia G. Morris, United States Bankruptcy Judge for the Southern District of New York, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to

participate in the Hearing must refer to Judge Morris's guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court's website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that oppositions to the Motion must: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York; (iii) state with particularity the legal and factual basis for such opposition; (iv) be filed with the Bankruptcy Court, with a copy to chambers; and (v) served upon the parties specified in the Motion, so as to be received no later than 4:00 p.m. (Eastern Time) on June 17, 2022. Replies in further support of the Motion shall be filed by July 29, 2022.

PLEASE TAKE FURTHER NOTICE that copies of the Motion can be obtained through the Bankruptcy Court's electronic case filing system at www.nysb.uscourts.gov using a PACER password, which can be obtained on the PACER website at www.pacer.gov.

[Remainder of page intentionally left blank.]

Dated: April 25, 2022
New York, New York

/s/ Anthony Paccione

KATTEN MUCHIN ROSENMAN LLP
50 Rockefeller Plaza
New York, NY 10022
Telephone: (212) 940-8800
Facsimile: (212) 940-8776
Anthony L. Paccione
Email: anthony.paccione@katten.com
Brian L. Muldrew
Email: brian.muldrew@katten.com

Attorneys for Defendants:
Access International Advisors LLC,
Access International Advisors Ltd.,
Access Management Luxembourg SA,
Access Partners SA, Patrick Littaye,
Claudine Magon de la Villehuchet (in her
capacities set forth in the caption above), and
Groupement Financier Ltd.

EXHIBIT A

Motions

1. Notice of Defendants Access International Advisors, LLC (“Access LLC”), Access International Advisors, Ltd. (“Access Ltd.”), Access Management (Luxembourg), S.A. (“AML”) (f/k/a Access International Advisors (Luxembourg) S.A. (“AIA (Lux)”), Access Partners, S.A (“AP (Lux)”), Patrick Littaye (“Littaye”) and Claudine Magon de la Villehuchet individually and in the capacities ascribed to her in the caption above (“CDLV,” and together with Access LLC, Access Ltd., AML, AP (Lux) and Littaye, the “Access Defendants”) and Groupement Financier Ltd. (“Groupement”) Motion to Dismiss the Trustee’s Complaint [Docket No. 21434]

- i) Related: Access Defendants’ and Groupement’s Memorandum of Law in Support of Its Motion to Dismiss the Trustee’s Complaint [Docket No. 21436]
- ii) Related: Declaration of Patrick Littaye in Support of Access Defendants’ and Groupement’s Motion to Dismiss the Trustee’s Complaint, and all exhibits thereto [Docket No. 21435]